

Jim Smith  
General Manager



Frankfort Plant Board

Water  
Cable  
Electric  
Security  
Local Phone  
Digital Cable  
Long Distance  
Community TV  
Ethernet/Internet  
Cable Modem/ISP  
Cable Advertising

January 30, 2012

Received & Inspected

**U.S.P.S. PRIORITY MAIL**

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Marlene H. Dortch  
Office of the Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Suite TW-A325  
Washington, DC 20554

**Re: CPNI Certification, EB Docket No. 06-36**

Dear Ms. Dortch,

Please find enclosed an original and four (4) copies of Frankfort Plant Board's CPNI Certification for 2011 covering the prior calendar year 2010.

I appreciate your assistance. If you have any questions, please contact me at 502-352-4541 or [hprice@fewpb.com](mailto:hprice@fewpb.com).

Sincerely,

Hance Price  
Staff Attorney

HP/kp

cc : Original & four (4) copies to  
Best Copy and Printing, Inc.  
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**CPNI COMPLIANCE CERTIFICATE**

Annual 47 C.F.R. § 64.2009(e) CPNI Certification

EB Docket 06-36

**Annual 64.2009(e) CPNI Certification for: 2012 covering the prior calendar year 2011**

**Date Filed: January 31, 2012**

**Name of Company covered by this certification: The Electric and Water Plant Board of the City of Frankfort, Kentucky ("FPB")**

**Form 499 Filer ID: 821040**

**Name of signatory: Milton Hance Price**

**Title of signatory: Staff Attorney**

I, Milton Hance Price, certify that I am Staff Attorney and an officer of FPB, and acting as an agent of FPB, that I have personal knowledge that FPB has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. See 47 C.F.R. § 64.2001 et seq.

Attached to this certification as Attachment 1 is an accompanying statement explaining how FPB's procedures ensure that FPB is in compliance with the requirements set forth in Section 64.2001 et seq. of the Commission's rules.

FPB has not taken any actions against data brokers in the past year.

FPB has not received any customer complaints in the past year concerning the unauthorized release of CPNI.

FPB represents and warrants that the above certification is consistent with 47 C.F.R. § 1.17 which requires truthful and accurate statements to the Commission. FPB also acknowledges that false statements and misrepresentations to the Commission are punishable under Title 18 of the U.S. Code and may subject it to enforcement action.

Signed: Milton Hance Price 1-31-2012  
Milton Hance Price

**ATTACHMENT 1  
TO CPNI COMPLIANCE CERTIFICATE**

**Statement Regarding CPNI Operating Procedures**

FPB's written CPNI Operating Procedures ensure that FPB will be in compliance with 47 U.S.C. § 222 and the rules contained in the Title 47, Chapter 1, Subchapter B, Part 64, Subpart U of the Code of Federal Regulations. Included among the provisions of FPB's CPNI Operating Procedures are:

- A requirement that FPB have at all times a CPNI Compliance Supervisor to supervise the implementation of FPB's CPNI Operating Procedures.
- Detailed procedures for safeguarding CPNI, including procedures for customer authentication and password protection of CPNI.
- Detailed procedures for determining what type of customer approval is necessary for use, disclosure and access to CPNI.
- A requirement that the billing system records for customers' accounts allow the status of the customer's CPNI approval to be easily ascertained.
- A requirement that personnel be trained as to when they are and are not authorized to use CPNI.
- A written disciplinary process for misuse of CPNI.
- Detailed filing, notice and recordkeeping requirements.
- Detailed procedures to be followed in the event of a breach of CPNI.

FPB does not use CPNI for marketing purposes.